



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

APR 01 2019

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
TRACKING NO. 7015 1520 0003 3990 9668

SBA Shipyard Site PRP Group
c/o Ms. Beth Hess
Project Coordinator
EHS Support LLC
30 Westgate Parkway, #314
Asheville, North Carolina 28806

RE: Cost Recovery Demand Letter/Bill for Collection
SBA Shipyard Superfund Site (A6FX)
Jennings, Jefferson Davis Parish, Louisiana
CERCLA Docket No. 06-08-16



Dear Ms. Hess:

This letter is regarding the SBA Shipyard Superfund Site (Site) and costs incurred by the U.S. Environmental Protection Agency (EPA) in the ongoing implementation of its responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §9601 *et seq.* Pursuant to the provisions of Section XVIII, Paragraph 78.b.-d. "Payment of Response Costs" of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) entered in Docket No. 06-08-16, demand is hereby made upon the respondents for reimbursement of response costs incurred by the EPA. This billing covers costs in the amount of \$313,292.73 incurred during the period of January 5, 2017, through February 28, 2019. Enclosed with this letter is an accounting of the costs along with the bill.

Please note, Enforcement Support Services (ESS) costs included in the cost documentation are related to Superfund documents and records support activities of the SBA Shipyard Site files. The activities include all aspects of Superfund document and records management, in particular digital conversions of documents and collections of all media for input into the Superfund Enterprise Management System (SEMS).

It is the Superfund Division's policy and national policy to digitally load or convert all incoming Superfund site records into SEMS by using Optical Character Recognition in a Portable Document Format which makes each document keyword searchable; whether in paper, image, microform, or

electronic form. Specifically, this effort will address continuation of existing document capture and conversion processes, including Administrative Records, Litigation Document Production, contracts and work performed documentation, and email handling for discovery and/or other records management related tasks.

Payment shall be made by electronic funds transfer (EFT) within thirty (30) days of receipt of this billing to:

Federal Reserve Bank of New York

ABA = 021030004

Account = 68010727

Swift Address = FRNYUS 33

33 Liberty Street

New York, New York 10045

Field Tag 4200 of the Fedwire message should read "D68010727 Environmental Protection Agency"

The name and address of the party(ies) making payment, CERCLA Docket No. 06-08-16 and SBA Shipyard Site (A6FX) must be clearly typed on the transmittal to ensure credit.

You must send simultaneous notice of such payment, including a copy of the EFT transmittal to the following:

Chief, Enforcement Assessment Section (6SF-TE)

U.S. EPA, Region 6

1445 Ross Avenue

Dallas, Texas 75202-2733

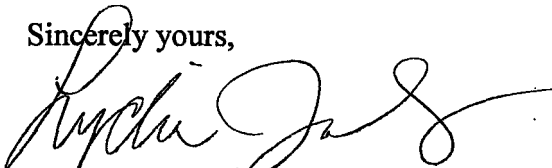
Your adherence to these procedures will ensure proper credit when payment is received. If the EPA does not receive payment within thirty (30) days after Respondents' receipt of the bill, interest will accrue on the amount due from the date of the bill at the current annual rate prescribed and published by the Secretary of the Treasury Fiscal Requirements Manual Bulletin per annum through the date of payment. Interest will be compounded annually at a new rate on October 1st of each year.

If dispute resolution is invoked, for the purposes of interest calculation, the due date for the disputed amount (with accrued interest) is within five (5) days of the resolution of the dispute.

Please take note that an obligation of a potentially responsible party to reimburse the United States for response costs incurred by the government in performing a response action at the Site constitutes a "debt" as the term is defined under the Federal Debt Collection Procedures Act, 28 U.S.C. §3002. Any act to obstruct the EPA's efforts to collect funds from you may be considered as a violation of the provisions of the Federal Debt Collection Act. Other penalties for failure to make a timely payment may also apply.

If you have any questions regarding this billing or the enclosures, please contact Doretha Christian at (214) 665-6734. If you have any technical questions, please contact Michael Torres at (214) 665-2108. Thank you for your cooperation.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Lydia Johnson', with a long, sweeping horizontal line extending to the right.

Lydia Johnson, Chief
Enforcement Assessment Section

Enclosures (2)

cc: Mr. Michael A. Chernekoff
Jones Walker, LLP
1001 Fannin Street, Suite 2450
Houston, Texas 77002
(CRRR Tracking #7014 0150 0000 2454 7372)

Bill For Collection		Bill Number 2761926S0033	
Bureau/Office for Remittance Payable		Date	
U.S. ENVIRONMENTAL PROTECTION AGENCY - REGION 6		APR 01 2019	
Address For Mailing Payment		Bill Amount	
P.O. BOX 979076 St. Louis, MO 63197-9000		\$313,292.73	
PAYER SBA Shipyard Site PRP Group c/o Beth Hess Project Coordinator EHS Support LLC 30 Westgate Parkway, #314 Asheville, NC 28806			
DATE	DESCRIPTION		AMOUNT
	To bill you for the response cost for the period 01/05/2017 through 02/28/2019 under CERCLA Docket No. 06-08-16 SBA Shipyard Site (A6FX). Reference attached letter from EPA Region 6, Enforcement Assessment Section. Payment is due within thirty (30) days of receipt of this billing.		\$313,292.73
Important:	A receipt will be issued for all cash remittances when required by applicable procedures. Failure to receive a receipt for cash payment should be reported to the office shown above. EPA Contact: Doretha Christian 214-665-6734	AMOUNT DUE	\$313,292.73

APR 01 2019

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
TRACKING NO. 7015 1520 0003 3990 9668

SBA Shipyard Site PRP Group
c/o Ms. Beth Hess
Project Coordinator
EHS Support LLC
30 Westgate Parkway, #314
Asheville, North Carolina 28806

RE: Cost Recovery Demand Letter/Bill for Collection
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Jennings, Jefferson Davis Parish, Louisiana
CERCLA Docket No. 06-08-16

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6SF-TE: 08/17/2018: Christian SBA Shipyard(A6FX) - Cost Recovery Demand/Billing Letter

Christian 6SF-TE	Talton 6SF-TE	M. Torres 6SF-RL	Atkins 6SF-RL	Chiang 6RC-S	Peycke 6RC-S	Banipal 6SF-TE
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8/24/18
3/19/19
8/24/18
concurrent
via email
2/22/19
3/20/19
8/24/18
3/25/19
3-22-19
3/25/19
3/26/19

If you have any questions regarding this billing or the enclosures, please contact Doretha Christian at (214) 665-6734. If you have any technical questions, please contact Michael Torres at (214) 665-2108. Thank you for your cooperation.

Sincerely yours,

Lydia Johnson, Chief
Enforcement Assessment Section

Enclosures (2)

cc: Mr. Michael A. Chernekoff
Jones Walker, LLP
1001 Fannin Street, Suite 2450
Houston, Texas 77002
(CRRR Tracking #7014 0150 0000 2454 7372)

ROUTING AND APPROVAL FORM

Date

08/24/18

3/19/19

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Christian (6SF-TE) <i>DC</i>	<i>DC</i>	8/28/18 3/19/19
2. Talton (6SF-TE) <i>Concurred via Email attached</i>	<i>BT</i>	8/28 3/21/19
3. M. Torres (6SF-RL)	<i>MA</i>	8/28/18 3/20/19
4. Atkins (6SF-RL)	<i>GA</i>	3/21/18 3/25/19
5. Twine (6RC-S)	<i>DI</i>	8/3/18
6. I-Jung Chiang (6RC-S)	<i>IC</i>	3-22-19
7. Mark Peycke (6RC-S)	<i>MARK</i>	03/28
8. Deborah Greenwell (6SF-T)	<i>dg</i>	3/25/19
9. Ben Banipal (6SF-T)	<i>BB</i>	8/28/19
10. Karen Kelley (6SF-TE)	<i>KK</i>	8/26/19

<input type="checkbox"/> Action	<input type="checkbox"/> File	<input type="checkbox"/> Note and Return
<input checked="" type="checkbox"/> Approval	<input type="checkbox"/> For Clearance	<input type="checkbox"/> Per Conversation
<input type="checkbox"/> As Requested	<input type="checkbox"/> For Correction	<input type="checkbox"/> Prepare Reply
<input checked="" type="checkbox"/> Circulate	<input type="checkbox"/> For Your Information	<input type="checkbox"/> See Me
<input type="checkbox"/> Comment	<input type="checkbox"/> Investigate	<input checked="" type="checkbox"/> Signature
<input type="checkbox"/> Coordination	<input type="checkbox"/> Justify	

REMARKS

11. Lydia Johnson 6SF-TE

SBA Shipyard (A6FX) - Cost Recovery Demand/Bill for Collection

PLEASE NOTE - Decision by site team to suspend issuance of the oversight bill was made on 09/05/18 and routing of billing documents was stopped. Following additional discussion/review of costs, the decision to proceed was made on 03/16/19; billing documents were revised and put back in concurrence on 03/19/19.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

DORETHA CHRISTIAN

Room No. - Bldg.
6SF-TE

Phone No.
(214) 665-6734

OPTIONAL FORM 41 (Rev. 1-94)
Prescribed by GSA

Christian, Doretha

From: Talton, Chuck
Sent: Thursday, March 21, 2019 6:46 AM
To: Kelley, Karen
Cc: Christian, Doretha
Subject: RE: SBA Shipyard (A6FX) Cost Recovery Demand/Bill for Collection

I concur. Thanks

From: Kelley, Karen
Sent: Wednesday, March 20, 2019 12:30 PM
To: Talton, Chuck <talton.chuck@epa.gov>
Cc: Christian, Doretha <christian.doretha@epa.gov>
Subject: FW: SBA Shipyard (A6FX) Cost Recovery Demand/Bill for Collection

Ken - I'm resending so I can include the information that was added to the routing/approval slip from Doretha as follows:

PLEASE NOTE - Decision by site team to suspend issuance of the oversight bill was made on 09/05/18 and routing of billing documents was stopped. Following additional discussion/review of costs, the decision to proceed was made on 03/16/19; billing documents were revised and put back in concurrence on 03/19/19.

Again, please use this e-mail with your response/concurrence so it can be added to the folder currently in concurrence.

Thanks.

Karen M. Kelley
NOWCC Employee/Assistant
Enforcement Assessment Section (6SF-TE)
(214)665-2227
kelley.karen@epa.gov

From: Kelley, Karen
Sent: Tuesday, March 19, 2019 2:50 PM
To: Talton, Chuck <talton.chuck@epa.gov>
Cc: Christian, Doretha <christian.doretha@epa.gov>
Subject: SBA Shipyard (A6FX) Cost Recovery Demand/Bill for Collection

Ken,

Attached are the revised billing documents and demand letter for SBA Shipyard that is being placed back into concurrence. Please look over the attached and let me know if you have any changes to the demand letter. Please use this e-mail to indicate those changes and/or your concurrence so I can attach it to the Routing slip.

Thanks.

Karen M. Kelley

NOWCC Employee/Assistant
Enforcement Assessment Section (6SF-TE)
(214)665-2227
kelly.karen@epa.gov

USPS Tracking®**FAQs** (<https://www.usps.com/faqs/uspstracking-faqs.htm>)**Track Another Package +****Tracking Number: 70151520000339909668****Remove**

Your item was delivered to an individual at the address at 12:35 pm on April 4, 2019 in ASHEVILLE, NC 28806.

Delivered

April 4, 2019 at 12:35 pm
Delivered, Left with Individual
ASHEVILLE, NC 28806

Get Updates**Text & Email Updates****Tracking History****Product Information**
U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.**OFFICIAL USE**

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$ _____
- ☐ Return Receipt (electronic) \$ _____
- ☐ Certified Mail Restricted Delivery \$ _____
- ☐ Adult Signature Required \$ _____
- ☐ Adult Signature Restricted Delivery \$ _____

Postage

\$

Total Postage and Fees

\$

Sent To

Street and

City, State

PS Form

SBA Shipyard Site PRP Group

Ms. Beth Hess

Project Coordinator

EHS Support LLC

30 Westgate Parkway, #314

Asheville, NC 28806

Postmark
Here

Feedback

See Less**Can't find what you're looking for?**

Go to our FAQs section to find answers to your tracking questions.

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$ _____
☐ Return Receipt (electronic) \$ _____
☐ Certified Mail Restricted Delivery \$ _____
☐ Adult Signature Required \$ _____
☐ Adult Signature Restricted Delivery \$ _____

Postage

\$

Total 1

\$

Sent 1

Street

City, State

SBA Shipyard Site PRP Group
c/o Michael A. Chernekoff
Jones Walker LLP
811 Main Street, Suite 2900
Houston, TX 77002

4/10/19
Postmark
Here

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

7015 1520 0003 3991 2460

UNITED STATES POSTAL SERVICE

POSTAGE WILL BE PAID BY ADDRESSEE
NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

12 APR 19

EN 31



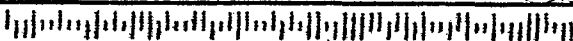
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

U.S.
Environmental Protection Agency
Region VI (6SF-TE)
1445 Ross Ave.
Dallas, TX 75202-2733

K Keneef

SBA



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

SBA Shipyard Site PRP Group
c/o Michael A. Chernekoff
Jones Walker LLP
811 Main Street, Suite 2900
Houston, TX 77002

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

Michael Chernekoff

C. Date of Delivery

4/12/19

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2.

7015 1520 0003 3991 2460